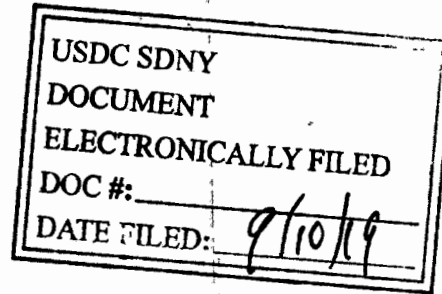


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re: PETROBRAS SECURITIES  
LITIGATION

This Document Applies To:

ALL CASES



14-cv-9662 (JSR)

**STIPULATION AND [PROPOSED] ORDER**

**WHEREAS**, on July 30, 2018, Richard Gielata, Emelina Gielata and Joseph Gielata (the "Gielatas") filed a Notice of Appeal from the June 25, 2018 Opinion and Order and the July 2 Final Judgment approving the class action settlement;

**WHEREAS**, on September 20, 2018, this Court ordered the Gielatas to post a bond for costs on appeal of \$50,000 under FRAP 7 (Docket #896);

**WHEREAS**, on August 30, 2019, the Second Circuit Court of Appeals entered a summary order affirming the district court's approval of the class action settlement;

**WHEREAS**, the Gielatas waived any further appeal and agreed to expedite issuance of the mandate, and the class plaintiffs and defendant Petróleo Brasileiro S.A. – Petrobras agreed to waive any costs on appeal;

**NOW, THEREFORE**, the parties agree, and request that the Court order as follows:

1. The Clerk of the Court shall release the FRAP 7 bond for costs on appeal.
2. The Clerk shall issue a check payable to Joseph Gielata in the amount of \$50,000.

Date: September 3, 2019  
New York, NY

Stipulated and agreed to by:

POMERANTZ LLP



By: \_\_\_\_\_

Jeremy A. Lieberman  
600 Third Avenue  
New York, New York 10016  
Tel: 212-661-1100  
Fax: 212-661-8665  
jalieberman@pomlaw.com

*Attorneys for Class Representatives and the  
Settlement Class*

CLEARY GOTTlieb STEEN &  
HAMILTON LLP

By: \_\_\_\_\_

Lewis J. Liman  
Jared Gerber  
One Liberty Plaza  
New York, New York 10006  
Tel: 212-225-2000  
Fax: 212-225-3999  
lliman@cgsh.com  
jgerber@cgsh.com

*Attorneys for the Petrobras Defendants*

By: \_\_\_\_\_

Joseph N. Gielata  
Emelina Gielata  
Richard Gielata  
7811 Eads Avenue #207  
La Jolla, CA 92037  
(302) 507-4400  
gielata@gmail.com

SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable Jed S. Rakoff  
United States District Judge

Date: September 3, 2019  
New York, NY


Stipulated and agreed to by:

POMERANTZ LLP

By: \_\_\_\_\_  
Jeremy A. Lieberman  
600 Third Avenue  
New York, New York 10016  
Tel: 212-661-1100  
Fax: 212-661-8665  
jalieberman@pomlaw.com

*Attorneys for Class Representatives and the  
Settlement Class*

CLEARY GOTTlieb STEEN &  
HAMILTON LLP

By:  \_\_\_\_\_  
Lewis J. Liman  
Jared Gerber  
One Liberty Plaza  
New York, New York 10006  
Tel: 212-225-2000  
Fax: 212-225-3999  
lliman@cgsh.com  
jgerber@cgsh.com

*Attorneys for the Petrobras Defendants*

By: \_\_\_\_\_  
Joseph N. Gielata  
Emelina Gielata  
Richard Gielata  
7811 Eads Avenue #207  
La Jolla, CA 92037  
(302) 507-4400  
gielata@gmail.com

SO ORDERED.

\_\_\_\_\_  
Honorable Jed S. Rakoff  
United States District Judge

Dated: \_\_\_\_\_

Date: September 3, 2019  
New York, NY

Stipulated and agreed to by:

POMERANTZ LLP

By:

Jeremy A. Lieberman  
600 Third Avenue  
New York, New York 10016  
Tel: 212-661-1100  
Fax: 212-661-8665  
jalieberman@pomlaw.com

*Attorneys for Class Representatives and the  
Settlement Class*

CLEARY GOTTlieb STEEN &  
HAMILTON LLP

By:

Lewis J. Liman  
Jared Gerber  
One Liberty Plaza  
New York, New York 10006  
Tel: 212-225-2000  
Fax: 212-225-3999  
lliman@cgsh.com  
jgerber@cgsh.com

*Attorneys for the Petrobras Defendants*

By:

Joseph N. Gielata  
Emelina Gielata  
Richard Gielata  
7811 Eads Avenue #207  
La Jolla, CA 92037  
(302) 507-4400  
gielata@gmail.com

*Emelina Gielata  
Richard P. Gielata*

SO ORDERED.

Dated: 9/6/19

*Jed S. Rakoff*  
Honorable Jed S. Rakoff  
United States District Judge

### Certificate of Service

I hereby certify that on September 4, 2019, I caused a true and correct copy of the foregoing Stipulation and Proposed Order to be electronically served by operation of the Court's electronic filing system, and to be served by mail upon:

Joseph Gielata  
7811 Eads Ave., #207  
La Jolla, California 92037

Richard Gielata  
100 Westbury Drive  
Coraopolis, Pennsylvania 15108

Emelina Gielata  
100 Westbury Drive  
Coraopolis, Pennsylvania 15108

Dated: September 4, 2019  
New York, New York

/s/ Jeremy A. Lieberman  
Jeremy A. Lieberman